EXHIBIT 8

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July 19, 2022   *Via Email*

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   **Re: *Rensselaer Polytechnic Institute et al. v. Amazon.com, Inc.*,
          18-cv-00549-BKS-TWD | Improper Depositions**

Jeremy:

   Amazon has not presented any compelling reasons for seeking the deposition of three RPI professors—Professors Nirenberg, McShane, and Strzalkowski—since the Court's June 6, 2022 telephonic hearing. Accordingly, Plaintiffs maintain that Amazon's requested depositions are improper, and further expressly incorporate the objections from Plaintiffs' prior correspondence.

   As the Court pointed out during the June 6th hearing, Amazon is improperly attempting to solicit expert testimony from RPI employees, all of whom are unrelated to this case. In particular, these professors were not employed at RPI at the time of the invention and have no knowledge about this case or the '798 Patent. Dr. Strzalkowski, for example, has only been at RPI for three years.

   Moreover, all three professors hail from RPI's Cognitive Sciences department—not RPI's Engineering or Computer Science departments (which birthed the invention from the '798 Patent). None of these professors has the requisite knowledge needed to testify regarding the "state of the art" as requested by Amazon. Dr. McShane, for example, has her M.A. and Ph.D. in Slavic Languages and Literatures.

   Even if Professors Nirenberg, McShane, or Strzalkowski had relevant information (they do not), such information would be unreasonably cumulative and duplicative, and such information is readily obtainable from other sources

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that are more convenient, less burdensome, and less expensive. *See* Fed. R. Civ. P.
26(b)(2)(C)(i). Specifically, Amazon has multiple experts who can testify about the
information at issue. Moreover, in the interest of resolving the present dispute and
saving the Court's time, Plaintiffs previously offered to Amazon the compromise
of Plaintiffs designating Dr. Cheng Hsu to testify on the following topics from
Amazon's 30(b)(6) notice—the same information that Amazon is seeking with
these professor depositions:

- **Amazon's 30(b)(6) Topic #13**: "The state of the art in natural language
  processing before 2000."

- **Amazon's 30(b)(6) Topic #14:** "Natural language processing research
  conducted at RPI after 2000."

Amazon refused to compromise.

       Plaintiffs also explained on June 29, 2022 that these professors have
academic and professional commitments (or a medical condition, in Professor
McShane's case) that will make it burdensome for them to attend a deposition.
Amazon's insistence on taking these depositions is out of proportion with respect
to the needs of the case.

       Plaintiffs remain available to discuss the above.

                                        Sincerely,

                                        Li Zhu

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